

**The Governance and Management of Radio Television Hong Kong Review Report  
Major findings and recommendations**

**(1) Mechanisms for editorial management and complaints handling**

***Editorial management***

- There are deficiencies in editorial management mechanism. There is no well-defined and properly documented editorial processes and decisions, nor clear allocation of roles and responsibilities among editorial staff. Weak editorial accountability is observed. Editorial decisions rest principally with individual production units/officers based on their own judgment. The Editor-in-chief and senior management have been put in a passive position in the programme production process;
- The “upward referral” and “mandatory referral” mechanisms for dealing with contentious and sensitive issues operate largely through verbal communication;
- RTHK has not put in place measures for quality assurance or compliance risk management prior to and during production, and prior to broadcast;
- RTHK does not effectively set out or explain, through any comprehensive policy documentation and detailed guidance, how the principles specified in the Charter of RTHK (the Charter), the Producers’ Guidelines and relevant codes of practice issued by the Communications Authority (CA) should be interpreted and applied in practice, so as to ensure that the programmes comply with standards; and
- RTHK has not proactively sought advice from the Board of Advisors on matters pertaining to editorial principles, programming standards and programming quality as required under the Charter.

***Complaints handling***

- The handling of complaints lacks transparency. There is no assurance that public complaints have been handled properly, objectively and impartially;
- The classification of complaints as “programme-related” is too broad and too loose, failing to differentiate which ones are related to editorial principles (such as whether the programmes are accurate and impartial);
- It allows a complaint to be investigated by the same officer/unit producing the programme under complaint, regardless of the gravity of the complaint, giving rise to role conflicts. Investigation and follow-up action of such cases are not properly documented. Nor is there any mechanism to ensure that the referral arrangements are strictly observed.
- Comprehensive reports and analyses on public complaints received and handling

of serious non-compliant cases are not submitted to the RTHK management, the Commerce and Economic Development Bureau (CEDB) and the Board of Advisors; and

- Only complaint statistics are disclosed. RTHK has not set out to the public details of complaints handling and the follow-up actions taken on individual cases.

**Recommendations:**

- To enhance editorial governance, RTHK should put in place a robust and transparent editorial process, with clearly defined editorial responsibilities at each editorial level and highlighting the decision-making role of the Editor-in-chief and directorate officers;
- To formulate a comprehensive set of editorial policies and guidelines for compliance by all its staff. Transparency and editorial training should be strengthened. Steps should be taken to ensure that lessons are learnt from substantiated complaints;
- To establish a proactive and collaborative partnership with the Board of Advisors. To seek advice actively from the Board of Advisors on matters pertaining to editorial principles, programming standards and quality of programming as well as public complaints relating to these matters;
- In the interest of transparency, RTHK should enhance its complaints handling mechanism to ensure that public complaints (with special emphasis on editorial complaints) received are handled properly and impartially; and
- To keep records of complaint investigation and follow-up action properly in order to enhance risk management against non-compliant cases.

**(2) Performance measurement and evaluation**

- The key performance indicators used by RTHK are not linked to the public purposes and mission as set out in the Charter. The public and stakeholders are unable to assess the extent to which RTHK has fulfilled the requirements of the Charter;
- Regular reports only carry technical data and programme information (such as total hours of transmission). The reports do not offer any review nor explanation on RTHK's extent of achievement towards its public purposes and mission with regard to its production. They also do not evaluate audience feedback. The Controlling Officer Report, Annual Plans and Annual Reports do not have good information for reference; and
- RTHK has not provided detailed reports with management analyses and performance measurement to the Board of Advisors and CEDB.

**Recommendations:**

- To set more meaningful performance targets/indicators to facilitate evaluation of the extent of its achievement of the public purposes and mission stipulated in the Charter; and
- To produce a more detailed annual plan and annual report, outlining its strategy and indicators, and reporting the results and achievements to the public, the Board of Advisors and CEDB.

**(3) Management of RTHK's workforce**

- RTHK does not have a holistic departmental manpower strategy, heavily relying on full time/part-time Non-Civil Service Contract (NCSC) staff (around 400) and Cat. II service providers (over 1 800 providers, around 3 000 service contracts);
- There is a total of around 540 civil service posts in the Programme Officer (PO) grade, divided into 14 work types under two main streams. The pre-mature streaming has resulted in departmental silos which impede collaborative working across professions. In the absence of structured training and posting arrangements, individual officers have limited exposure beyond their respective work types. The compartmentalised mode of operation in RTHK renders divisional/sectional considerations focusing mainly on short-term operational needs to take precedence over wider longer-term corporate interests. This is not conducive to the grooming of leadership in RTHK, and has significant implications for succession in the department.
- Administration of contract staff and freelancers has been devolved to divisions, yet without adequate corporate-level monitoring to ensure administrative efficiency and cost-effectiveness; and
- Cat. II service providers are not RTHK staff or employees. The originally approved scheme, endorsed by the Finance Committee of the then Legislative Council, covers five service categories (namely casual artists, disc jockeys, scriptwriters, researchers and contributors), which have proliferated over the years to cover 76 different job titles currently. Some of these job titles duplicate typical duties of the PO grade; and administration for Cat. II service providers is loose, especially in areas such as approval of contracts, engagements, declaration of interests, conduct and performance evaluation etc. As these contracts are awarded by production units without going through open procurement process, there would be a chance of conflict of interests.

**Recommendations:**

- To formulate a holistic departmental manpower strategy to critically review and rationalise the role and core functions, the skillset requirements as well as the streaming arrangement of the PO grade. Pre-mature streaming and compartmentalised approach in staff management would also be reviewed with a view to enhancing professionalism and fostering internal synergy to better meet

RTHK's operational and succession needs and to sustain the department's long-term development;

- To review and improve the administration of its non-civil service contract staff and Cat. II service providers to ensure administrative efficiency and cost-effectiveness;
- To ensure that all RTHK members have a comprehensive understanding of the Charter, including RTHK's obligations as a public service broadcaster and a government department;
- To formulate a code of conduct applicable to RTHK members in or out of the course of their work, properly manage conflicts of interest and compliance risk to safeguard RTHK's reputation and credibility; and
- To critically review whether the current design of the Cat. II scheme adheres to the original intention and scope as approved by the Finance Committee.

#### **(4) Financial management**

- RTHK's budgetary planning process is not fully aligned with its business planning cycle. Budgetary planning often focuses on short-term operations; and
- RTHK has not conducted post-year end review of financial performance and evaluation of cost-effectiveness in the use of departmental resources, which could assist planning for the next budgetary cycle and funding allocation for the new financial year.

#### **Recommendations:**

- To integrate its financial and business planning, driven by a holistic corporate strategy covering the short to medium term, with the aim to assist budgetary planning and funding allocation for the new financial year; and
- To involve Finance and Resources Unit (FRU) more closely in the Resource Allocation Exercise process. FRU could provide more professional input with regard to strategic functions and systemic issues in financial management. In addition, RTHK management should actively engage Systems Review Unit to step up compliance checks and conduct more value for money audits to examine RTHK's operations and activities with a view to providing assurance that resources are utilised efficiently, effectively and economically.

#### **(5) Stores and procurement**

- The over-reliance on procurement by quotation rather than open tendering, inadequate planning (e.g. short quotation invitation period), a deficient

Departmental Supplies List and the lack of a control mechanism at the central department level are not conducive to the achievement of value through open and fair competition.

**Recommendations:**

- To initiate a strategic review to assess the effectiveness of its procurement system. Professional support for supplies-related matters also needs reinforcement. RTHK should step up oversight of procurement activities in the department and provide strategic input; and
- To conduct reviews on supplies activities in RTHK in its regular compliance audits, interpret the financial limits set out in the Stores and Procurement Regulations strictly and consult relevant expert departments for advice on procurement-related matters, where necessary.

**(6) Information technology management**

- RTHK operates in an industry disrupted by media convergence. Yet, the department lags behind in harnessing the potential of information, communication and technology (ICT) to raise its corporate performance.

**Recommendations:**

- To formulate a comprehensive information technology (IT) strategic plan and maximise the value of ICT in achieving the department's business objectives; and
- To conduct an organisational review with a view to rectifying the prevailing fragmented approach to IT management in the department.

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